

EIS Scoping Comment on Impacts of Fire at the Proposed Gateway Pacific Terminal (GPT)

My name is Michael Crum. On February 17, 2012, smoke from the BP Refinery fire moved over all of Birch Bay, within 15 minutes of the emergency warning sirens ... serving as a reminder that wind-blown emissions from the Cherry Point area quickly impact nearby residents and businesses.



GPT's uncovered stockpiles would span 80 acres with coal over 60' high in five, half-mile long rows; that's 2 1/2 miles of uncovered coal piled higher than a six story building. The risk of fire in those enormous stockpiles is so great that GPT proposes to use 1.9 billion gallons of water annually or 5.33 million gallons per day to help with the suppression of dust and spontaneous combustion.

Bordering the proposed GPT site to the north is BP Cherry Point Refinery, with its towering structures and its oil tanker loading dock facilities. Since the beginning of operations, BP's refinery has been surrounded by and has benefitted from pristine air quality. With the proposed GPT located immediately adjacent to the southern boundary of the BP property, that would no longer be the case. In fact, accumulations of wind-blown coal dust emissions upon BP's towering structures (electrical and mechanical sensors, valves, connectors, etc.) and spontaneous combustion within GPT's massive uncovered coal stockpiles pose potential adverse, if not catastrophic, impacts upon the safety of BP Refinery operations and upon the health and safety of BP's 850 employees.

GPT's Project Information Document, Chapter 5, Public Services, 5.8.1.2, Fire and Emergency Medical Services, states: "Terminal security staff would include employees fully trained in specific emergency procedures. These emergency personnel would be trained as first responders for fire and other emergency response scenarios, including medical emergencies. Gateway Pacific Terminal is located within Fire District No. 7, based in the city of Ferndale. Five of the district's stations could respond to calls from the Terminal. These stations are located near the following intersections:

- Brown and Kickerville Roads;
- Grandview and Koene Roads;
- Northwest and Smith Roads;
- Grandview and Enterprise Roads; and
- Washington Avenue and 3rd Street in Ferndale.

Fire District No. 7 has approximately 20 full-time career responders and 40 volunteer firefighters. The first two stations that would respond to calls to the Terminal would be volunteer stations, with the next two staffed stations."

The Whatcom County Fire District Seven website (<http://www.wcfd7.org/>) describes the aforementioned stations as follows:

- Brown and Kickerville (4047 Brown Rd.) Station 42 "Westside"- Unmanned, Volunteer response;
- Grandview and Koene (5491 Grandview) Station 44 "Birch Bay Station"- Unmanned, Volunteer response;
- Northwest and Smith (5368 Northwest Dr., Bellingham) Station 43 "North Bellingham Station"- Manned, 24/7;

- Grandview and Enterprise (1886 Grandview Road) Station 45 “Northeast Side” – Unmanned, Volunteer response;
- Washington Avenue and 3rd Street in Ferndale, Station 41 “Downtown”- Manned Monday thru Friday, 8am-4pm.

Whatcom County Fire District Seven, Station 43 “North Bellingham Station,” the only Manned (24/7) station, is located approx. 11.2 miles or 20-35 minutes travel time (depending upon rail crossing delays) from the proposed GPT. Station 43 is separated from the proposed GPT site by a railroad crossing and by the City of Ferndale. Eighteen additional coal trains per day would increase the probability of critical delays at railroad crossings, adding to delayed emergency response time from the one fully manned fire station listed in the GPT information document. Stated differently, GPT’s demand for significantly increased rail traffic introduces potentially adverse impacts to emergency response times for citizens of Ferndale and western Whatcom County as well as for fires at GPT’s volatile and toxic coal stockpiles.

GPT’s Project Information Document, Chapter 5, Public Services, 5.8.3, Proposed Design Features Intended to Reduce Impacts, states: “... tax revenue ... would go to the state and local jurisdictions and could be used to offset increases in demand for fire and emergency services. However, a lag time between when the tax revenues could be directed to the services and when the services would be needed is anticipated. Fire District No. 7 anticipates there would be an 18- to 24-month delay due to funding cycles before fire services would be expanded (Hoffman 2011)”

To summarize, the GPT Project Information Document identifies five fire stations for emergency response. The first two stations to respond offer only unmanned, volunteer response. The next two are Station 41, manned only M-F (8-4) and Station 43, located more than eleven miles away and separated from GPT both by the City of Ferndale and one rail crossing (with an additional 18 coal trains per day). And worse, the document admits an anticipated 18-24 month lag-time between when expanded emergency services would be needed and when services could be expanded (by the public) to meet those needs. Is GPT’s Project Information Document, Chapter 5, a description of the applicant’s plan for emergency fire and medical services or is it, more accurately, the applicant’s prescription for disaster?

I ask that the following be included and systematically analyzed within the scope of the EIS:

- Impacts to the health and safety of employees at the GPT site from uncontrolled coal stockpile fires resulting from inadequate fire and emergency medical services.
- Impacts to the safety of operations at the BP Cherry Point, oil tanker loading docks from GPT’s uncontrolled coal stockpile fires resulting from inadequate fire and emergency medical services.
- Impacts to the safety of operations at BP Cherry Point Refinery’s towering structures from GPT’s uncontrolled coal stockpile fires resulting from inadequate fire and emergency medical services.
- Impacts to North Whatcom Fire Rescue, District 21’s availability of emergency services to its residents and businesses in Birch Bay while responding to requests for urgently needed back-up from Whatcom County Fire District No. 7’s attempt to provide adequate fire and emergency medical services to GPT’s uncontrolled coal stockpile fires.
- Potential for a fire, either at GPT or at BP Refinery, causing a fire at the other facility.

